

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

JONATHAN S. ABADY  
MATTHEW D. BRINCKERHOFF  
ANDREW G. CELLI, JR.  
RICHARD D. EMERY  
DEBRA L. GREENBERGER  
DIANE L. HOUK  
DANIEL J. KORNSTEIN  
JULIA P. KUAN  
HAL R. LIEBERMAN  
ILANN M. MAAZEL  
KATHERINE ROSENFELD  
ZOE SALZMAN  
SAM SHAPIRO  
EARL S. WARD  
O. ANDREW F. WILSON

ATTORNEYS AT LAW  
600 FIFTH AVENUE AT ROCKEFELLER CENTER  
10<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000  
FAX: (212) 763-5001  
www.ecbawm.com

MONDAIRE JONES  
VASUDHA TALLA

ERIC ABRAMS  
NICK BOURLAND  
DANIEL M. EISENBERG  
ARIADNE M. ELLSWORTH  
SARA LUZ ESTELA  
LAURA S. KOKOTAILO  
SONYA LEVITOVA  
SARAH MAC DOUGALL  
SANA MAYAT  
HARVEY PRAGER  
VIVAKE PRASAD  
MAX SELVER  
EMILY K. WANGER

April 18, 2024

***Via ECF***

Hon. Vernon S. Broderick, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

*Re: Goidel et al. v. Aetna Life Insurance Co.*, No. 21-cv-7619

Your Honor:

Pursuant to Your Honor's Individual Rule 4.B., we write to request additional pages, for a total of 50 pages, for Plaintiffs' forthcoming Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of the Settlement Agreement, due to be filed on May 3, 2024. *See* Dkt. 88. Defendant consents to this request.

As detailed in the recent Status Report filed by Defendant, the structure of the settlement of this case is exceptionally complex and anticipates extensive and significant monetary and injunctive relief. *See* Dkt. 86. A lengthy memorandum of law is necessary for Plaintiffs' to properly summarize the key elements of the settlement agreement and to demonstrate why preliminary approval of the settlement is appropriate pursuant to the factors enumerated in Federal Rule of Civil Procedure 23(e)(2) and in *City of Detroit v. Grinnell Corp.*, 495 F.2d 448, 463 (2d Cir. 1974). Plaintiffs anticipate being able to do so in a brief of 50 pages (excluding the tables of contents and authorities), at maximum. Defendant consents to this request and will not oppose Plaintiffs' motion for preliminary approval. There would therefore be no prejudice to any party should the Court grant this request.

For the foregoing reasons, Plaintiffs respectfully request that the Court so order this request. We appreciate the Court's attention to this matter.

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

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Sincerely,

/s/

EMERY CELLI BRINCKERHOFF  
ABADY WARD & MAAZEL LLP

Zoe Salzman

Debra Greenberger

Eric Abrams

600 Fifth Avenue, 10<sup>th</sup> Floor

New York, New York 10020

(212) 763-5000

NATIONAL WOMEN'S LAW CENTER

Michelle Banker

Alison Tanner\*

Noel R. León

Sudria H. Twyman\*

Donya Khadem\*

1350 I Street NW, Suite 700

Washington DC 20005

(202) 588-5180

*Attorneys for Plaintiffs*

\*Admitted *pro hac vice*